

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

XIAMEN ITG GROUP CORP., LTD.,

Petitioner,

-against-

CRYSTAL VOGUE, INC.,

Respondent.

Civil Action No. 21-cv-02813

NOTICE OF MOTION

PLEASE TAKE NOTICE, upon the attached Memorandum of Law, the Declaration of Michael S. Horn and accompanying exhibits, the Declaration of Brian Wu and accompanying exhibits, and all other papers and proceedings herein Respondent, Crystal Vogue will move before this Court on **May 3, 2021** at the United States District Courthouse, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order: 1) pursuant to Fed. R. Civ. Pro. 12(b)(3), 12(b)(6), 12 (b)(7) and Rule 8 (a) dismissing the Petition; or, in the alternative, 2) staying the case pending the resolution of Xiamen ITG Group Corp., Ltd. v. Peace Bird Trading Corp., et al. Civil Action No. 19-CV-6524; or, in the alternative, 3) transferring this matter from this Court to Xiamen ITG Group Corp., Ltd. v. Peace Bird Trading Corp., et al. Civil Action No. 19-CV-6524 so that these matters can be consolidated pursuant to Fed. R. Civ. Pro.

42(a). The basis for the motion is set forth in the accompanying memorandum of law.

Respectfully Submitted,

ARCHER & GREINER, P.C.

21 Main Street, Suite 353

Court Plaza South, West Wing

Hackensack, New Jersey 07601

Phone No.: (201) 498-8529

Facsimile: (201) 342-6611

Attorneys for Respondent, Crystal Vogue

By: /s/ Michael S. Horn, Esq.

Michael S. Horn, Esq.

mhorn@archerlaw.com

To: Ruofei Xiang, Esq.
Mazzola Lindstrom, LLP
1350 Avenue of the Americas, 2nd Floor
New York, New York 10019

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